

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE

MELISSA WILSON., <i>et al.</i> , individually	)	
and on behalf of all others similarly	)	
situated,	)	
	)	
<i>Plaintiffs,</i>	)	Civil Action No. 3:14-CV-01492
	)	
v.	)	Judge William L. Campbell, Jr.
	)	Magistrate Judge Newbern
WENDY LONG, <i>et al.</i> ,	)	
	)	
<i>Defendants.</i>	)	
_____	)	

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS**

Pursuant to Rule 54(d) of the Federal Rules of Civil Procedure and Local Rule 54.01, Plaintiffs respectfully move for attorneys' fees and costs. Plaintiffs are prevailing parties and are entitled to an award of reasonable attorneys' fees under 42 U.S.C. § 1988.

As described in greater detail in Plaintiffs' Memorandum of Support and the attached declarations, Plaintiffs have limited their request to hours expended filing the action, securing the preliminary injunction and class certification order, and defending those orders from Defendants' motions to dismiss. The fees Plaintiffs seek are reasonable, both in terms of the hours and rates claimed, and in terms of other factors considered by courts in assessing fee petitions. Plaintiffs also claim costs which were necessary to achieve the success obtained.

For the foregoing reasons and those detailed in the Memorandum of Support, Plaintiffs request that this Court enter an Order awarding them attorneys' fees and costs in the total amount of \$379,081.

Dated: March 4, 2019.

Respectfully submitted,

/s/ Samuel Brooke

Samuel Brooke

*On Behalf of Counsel for Plaintiffs*

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**Attorneys for Plaintiffs**

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## CERTIFICATE OF SERVICE

I hereby certify that on this day a true and correct copy of the foregoing was filed with the Court through the CM/ECF filing system, and that by virtue of this filing notice was sent electronically to all counsel of record, including:

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Dated: March 4, 2019

s/ Samuel Brooke  
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